

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
By: DT  
Deputy

- 1) Ruger Model Security-390, .380 caliber handgun, Serial number 386-25590;
- 2) Stoeger, Model STR-9C, 9mm handgun, Serial Number T6429-23S02935;
- 3) Taurus, G3, 9mm handgun, Serial Number ADE335965;
- 4) Bersa, Model Thunder 380, .380 caliber handgun Serial Number L77218;
- 5) Taurus Model G3, 9mm handgun, Serial Number ABK014892;
- 6) Smith & Wesson, Model M&P 380 Shield EZ, .380 caliber handgun Serial Number RDX4216;

- 7) Smith & Wesson, M&P, 9mm handgun, Serial Number HNN9301;
- 8) Taurus, Model 856, .38 Special caliber handgun Serial Number AEC166904;
- 9) Taurus, Model G3C, 9mm handgun Serial Number 1KA30353;
- 10) Stoeger, Model STR-9C, 9mm handgun Serial Number T6429-23S03973;
- 11) Hi-Point., Model CF380, .380 ACP caliber handgun Serial Number P8196384;
- 12) Taurus, Model G3, 9mm handgun Serial Number ADJ637806; and
- 13) Taurus, Model G2C, 9mm handgun serial number AEB11331;

in or otherwise affecting interstate or foreign commerce, for, on behalf of, or at the request or demand of any other person, knowing or having reasonable cause to believe that such other person intended to use, carry, possess, or sell or otherwise dispose of the firearms in furtherance of a felony, to wit: smuggling the firearms from the United States into the Republic of Mexico in violation of Title 18, United States Code, Section 554, all in violation of Title 18, United States Code, Section 932 (b)(2), (c)(1).

**COUNT TWO**  
**(18 U.S.C. § 933 (a)(1), (a)(3) and (b))**

Beginning on or about May 11, 2023, and continuing until the date of the return of the indictment, in the Western District of Texas, the Defendant,

**GISELLE CASTANEDA-CORTEZ,**

did knowingly conspire and agree with persons known and unknown to the grand jurors to ship, transport, transfer, cause to be transported, and otherwise dispose of one and more firearms, including, but not limited to, the following:

- 1) Ruger Model Security-390, .380 caliber handgun, Serial number 386-25590;
- 2) Stoeger, Model STR-9C, 9mm handgun, Serial Number T6429-23S02935;

- 3) Taurus, G3, 9mm handgun, Serial Number ADE335965;
- 4) Bersa, Model Thunder 380, .380 caliber handgun Serial Number L77218;
- 5) Taurus Model G3, 9mm handgun, Serial Number ABK014892;
- 6) Smith & Wesson, Model M&P 380 Shield EZ, .380 caliber handgun Serial Number RDX4216;
- 7) Smith & Wesson, M&P, 9mm handgun, Serial Number HNN9301;
- 8) Taurus, Model 856, .38 Special caliber handgun Serial Number AEC166904;
- 9) Taurus, Model G3C, 9mm handgun Serial Number 1KA30353;
- 10) Stoeger, Model STR-9C, 9mm handgun Serial Number T6429-23S03973;
- 11) Hi-Point., Model CF380, .380 ACP caliber handgun Serial Number P8196384;
- 12) Taurus, Model G3, 9mm handgun Serial Number ADJ637806; and
- 13) Taurus, Model G2C, 9mm handgun serial number AEB11331;

to another person, in and affecting interstate and foreign commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony (as defined in section 932(a)), in violation of Title 18, United States Code, Sections 933(a)(1), (a)(3), and (b).

**NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE**

**[See Fed. R. Crim. P. 32.2]**

**Firearms Trafficking Violations and Forfeiture Statutes**

**[Title 18 U.S.C. § 932, subject to forfeiture pursuant  
to Title 18 U.S.C §§ 934(a)(1)(A) and (B)]**

As a result of the criminal violations set forth in Counts One and Two, the United States of America gives notice to Defendant **GISELLE CASTANEDA-CORTEZ** of its intent to seek the forfeiture of certain properties upon conviction and pursuant to FED. R. CRIM. P. 32.2, Title 18 U.S.C. § 932, which state:

**Title 18 U.S.C. § 934. - Forfeiture and Fines**

**(a) Forfeiture.**

(1) In General.— Any person convicted of a violation of section 932 or 933 shall forfeit to the United States, irrespective of any provision of State law—

(A) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation; and

(B) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation, except that for any forfeiture of any firearm or ammunition pursuant to this section, section 924(d) shall apply.

**II.**

**Money Judgment**

A sum of money that represents the amount of proceeds obtained, directly or indirectly, property involved in such offense, or traceable to such property as a result of the violations set forth above for which Defendant **GISELLE CASTANEDA-CORTEZ** is liable.

**Substitute Assets**

If any of the above-described forfeitable property, as a result of any act or omission of the Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture, pursuant to Title 21 U.S.C. § 853(p), as incorporated by Title 28 U.S.C. § 2461(c), of any other property of said Defendant up to the value of the forfeitable property.

A TRUE BILL.



FOREPERSON OF THE GRAND JURY

JAIME ESPARZA  
UNITED STATES ATTORNEY

BY:   
Assistant United States Attorney